

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

PAUL DEL GROSSO and
ESTHER DEL GROSSO,

Plaintiffs,

vs.

STATE FARM MUTUAL AUTOMOBILE)
INSURANCE COMPANY and)
STATE FARM FIRE & CASUALTY CO.,)

Defendants.)

Case No. 4:09-cv-01940CAS

TRIAL BRIEF

Missouri recognizes the applicability of the rear-end doctrine which states, “if one has his vehicle in a portion of the highway where he should have it in view of his course, and another traveling behind him in the same direction overtakes him and permits his vehicle to run into the rear of the one ahead, proof of the collision ... makes out a prima facie case of specific negligence against the driver operating the overtaking vehicle.” Clark v. Belfonte Distributing, Inc., 163 S.W.3d 581, 583 (Mo.App., 2005).

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I hereby certify that on January 17, 2011 the foregoing was filed electronically with the Clerk of Court to be served by operation of the Court's electronic filing system upon the following:

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